

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA

v.

Criminal No. 1:08-CR-80-1, 2, 3, 4, 5

JASON MERCHANT,
MICHAEL GOMBOS,
aka "John McDonald,"
aka "Robert Wilder,"
ROLAND LABBE,
JOSH YOUNG, and
ALBERT BONAMICI,

Defendants.

BY
CLERK
DEPUTY CLERK

2009 SEP 15 PM 2:13

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

FIRST SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges:

Beginning on a date unknown to the Grand Jury, to in or about April 2006, in the District of Vermont and elsewhere, JASON MERCHANT, MICHAEL GOMBOS, aka "John McDonald," aka "Robert Wilder," ROLAND LABBE, JOSH YOUNG, and ALBERT BONAMICI, the defendants, conspired with each other and others known and unknown to the Grand Jury knowingly and intentionally to distribute marijuana, a Schedule I controlled substance.

It is further alleged that the amount of controlled substance involved in this offense was 1,000 kilograms or more of marijuana, a Schedule I controlled substance.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A))

COUNT TWO

The Grand Jury charges:

On or about October 28, 2004, in the District of Vermont and elsewhere, MICHAEL GOMBOS, aka "John McDonald," aka "Robert Wilder," and ALBERT BONAMICI, the defendants, aiding and abetting each other and others known to the Grand Jury, did knowingly and intentionally import a quantity of marijuana, a Schedule I controlled substance, into the United States from a place outside the United States.

It is further alleged that this offense involved 100 kilograms or more of marijuana, a Schedule I controlled substance.

(21 U.S.C. §§ 952, 960, 960(b)(2)(G); 18 U.S.C. § 2)

A TRUE BILL

Tristram J. Coffin (BAM)
TRISTRAM J. COFFIN
United States Attorney

Burlington, Vermont
September 15, 2009